

# SEQUIM DUNGENESS WATER USERS ASSOCIATION(WUA)

## 30% Design Comments

The WUA has long been an active participant in very successful water conservation measures to improve the streamflow of the Dungeness River. We continue to be engaged in improving late season instream flows by exploring all options including the off-channel reservoir. The purpose of this reservoir project has been to benefit fish and fish habitat by increasing instream flows during late irrigation season.

Before moving towards the 60% design, the fundamental operating parameters of the proposed project need to be understood and negotiated. There are four fundamental areas that still need to be addressed and have been brought forward since the inception of the project. Water rights, water quality, operation and maintenance cost responsibility and liability, and comprehensive project design. Below is a list of issues that WUA have identified, that need additional clarification, and resolution before moving into the 60% design.

### 1) Water Rights

- a. No changes to our existing Water Right Certificates will be supported.
- b. Any modifications needed to support, fill and operate the Reservoir will need to be negotiated as an addendum to our existing Water Right Certificates, and include the following:
  - i. Right to divert Max Allocation water for storage.
  - ii. Right to use existing water right, during irrigation season, to store water for late season use.
  - iii. Water Right to use stored water to supply users.
- c. Agreement on how we integrate stored water use with our 50% MOU agreement.
  - i. Must not negatively affect non participant Company/Districts
    1. Non participant irrigation Company/Districts will continue to use existing water rights and agreements.
  - ii. Providing we have adequate stored water, Participating users will be able to increase water use during late season above recent historical usage levels. They will not be restricted by the 50% rule, while using stored water.

### 2) Water Quality

- a. If Stored water is not maintained at a high quality, individual Companies or Districts will have the right to refuse usage of stored water and utilize their historic river diversion during late season.
- b. Water quality monitoring program of stored water will need to be negotiated in order to be clearly described in 60% design.
- c. Diverting Storm Water/Overland Flow into reservoir will increase probability of refusal by Companies or Districts.
  - i. City of Sequim's infiltration site should be primary location to manage all storm water.

**3) Maintenance, Operation, and Financial Responsibility Plan**

- a. WUA members do not have the financial capability to cover any costs beyond wheeling of stored water from the project point of delivery through their respective systems.
- b. Financial Responsibility must be clearly defined and agreed to by all key partners at 60% design. If final cost of operations are not available at 60%, the parties responsible to cover them can be agreed upon.
- c. Participating irrigation entities will be responsible for wheeling water from project point of delivery through their respective systems.
- d. The main purpose of this project is to improve fish habitat and increased fish population, which benefits the public at large. The funds required to maintain and operate this reservoir should come from the local, state, and federal beneficiaries.

**4) Comprehensive Project Design**

- a. All components of this project, from point of diversion (River) to point of delivery for each Company and District, must be included in 60% design.

**5) Safety**

- a. WUA would like to see all options available for lowering the dike height.
- b. The safety of our down gradient users is critically important
- c. WUA want to make sure that the option of a secondary berm, possibly utilizing the volume of excess material created during construction, be built down gradient of reservoir to divert water back to river in the case of a catastrophic event.

**6) Other**

- a. Hydro Power
  - i. Hydro power generation from reservoir fill pipeline should be evaluated.
    - 1. This power can help offset some of the M&O cost of aeration
  - ii. Floating solar panels should be explored.
    - 1. This will help offset M&O costs.
    - 2. This will also help decrease the rise in temperature as the water is being stored.
- b. Cleaning/Access
  - i. Detailed cleaning/dredging plan needs to be proposed at 60% design. What is optimal method to remove built up sediment, wheel loaders, vac-trucks? etc.
- c. Cost / Benefit Analysis
  - i. Drought year water leasing program in 2019 returned about 9 cfs of water to the river for the last 30 days for the approx. cost of \$240,000. Drought years, on average, happen every 3 years. This reservoir project, as currently designed, will return about 15-20 cfs to the river for the last 30 days at a cost of \$\_\_\_\_\_, annually.
  - ii. After M&O cost for reservoir are established an updated cost/benefit analysis should be completed to ensure this project is a responsible use of public funds.